Remarks

In the present response, claim 1 is amended. Claims 1-20 are presented for examination.

I. Claim Rejections: 35 USC § 102

Claims 1, 4, 5, 7, and 8 are rejected under 35 USC § 102 as being anticipated by USPN 6,701,306 (Kronmiller). This rejection is traversed.

A proper rejection of a claim under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim. See MPEP § 2131, also, *W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Since Kronmiller neither teaches nor suggests each element in claims 1, 4, 5, 7, and 8, these claims are allowable over Kronmiller.

Claim 1 recites numerous recitations that are not taught or suggested in Kronmiller. By way of example, claim 1 recites designating an edge for each border tile. Claim 1 is further amended to recite "generating the attributes of the border tiles based on whether the designated edge of each border tile **crosses the polygon, is within the polygon, or is outside the polygon**" (emphasis added). Nowhere does Kronmiller teach or suggest this recitation. In fact, the Examiner appears to agree with this conclusion:

> Kronmiller discloses all of the claimed limitations as stated above, except that the attribute is selected from the group consisting of: the at least one edge crossing a segment, the at least one edge disposed completely within the polygon, and the at least one edge disposed completely outside the polygon. (See OA at p. 5).

For at least these reasons, claim 1 is allowable over Kronmiller. The dependent claims are allowable for at least the reasons given in connection with claim 1.

II. Claim Rejections: 35 USC § 103

Claims 6, 9, 10, 12, 13, and 16-18 are rejected under 35 USC § 103 as being unpatentable over Kronmiller in view of USPN 6,873,343 (Chui). This rejection is traversed.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. For at least the following reasons, Applicants assert that the rejection does not satisfy these criteria.

Independent claims 9 and 16 recite numerous limitations that are not taught or suggested in Kronmiller and Chui. By way of example, Applicants argue independent claim 16.

In claim 16, a border tile is identified that has an edge and that intersects a segment. A spatial relationship is then identified between the edge and the polygon. This spatial relationship is one of: "**(1) the at least one segment crossing the edge, (2) the edge being located within the polygon, and (3) the edge being located outside the polygon**" (emphasis added). Kronmiller and Chui fail to teach or suggest these recitations regarding the spatial relationship.

The Examiner admits that Kronmiller does not teach the spatial relationship of (1), (2), and (3) as recited in claim 16 (see OA at p. 5 and quoted above in connection with the § 102 rejection). Thus, the issue is whether Chui teaches or suggests the recitations or (1), (2), and (3) regarding the spatial relationship. Chui does not.

In several locations, Chui expressly teaches how the image data is tiled. As taught in column 10, raw image data is treated as an array of tiles, with overhanging portions filled with copies of boundary data (10: 5-15). A wavelet-like decomposition transform is then applied to each tile (10: 24-26). The transformed tile images are then compressed, encoded, and stored as an image file (13:26-28). Chui reiterates this teaching in column 17 (see 17: 48-67). Nowhere does Chui teach or even suggest that the spatial relationship

identified between an edge of a tile and the polygon is one of (1), (2), and (3) as recited in claim 16.

The Office Action cites several sections in Chui for teaching the spatial relationship of claim 16 (see OA at p. 6, citing Chui at 36: 58-67; 27: 1-4). Applicants respectfully disagree. First, as noted above, columns 10 and 17 in Chui expressly teach how the image data is tiled. These sections do not teach or suggest the three different spatial relationships of (1), (2), and (3) as recited in claim 16. Second, the sections cited by the Examiner relate to how Chui performs the wavelet-like decomposition (see Chui beginning at 19: 18). This section of Chui is not directed to a spatial relationship identified between the edge of a border tile and an intersecting segment to define an attribute of the border tile with respect to the polygon. Again, this section of Chui is directed to compressing interior tiles. Third, even assuming arguendo that this portion of Chui is directed to the subject matter of claim 16 (which it is not), the cited sections of Chui fail to teach or suggest all the elements of claim 16. Specifically, claim 16 expressly recites three different spatial relationships of (1), (2), and (3). By contrast, the cited sections of Chui merely teach that interior tiles are classified in one of two ways: as either hard or easy. All three elements of (1), (2), and (3) are missing from the teachings in Chui.

For at least these reasons, independent claims 9 and 16 are allowable over Kronmiller and Chui. The dependent claims are allowable for at least these reasons.

III. Allowable Subject Matter

Applicants sincerely thank the Examiner for indicating allowance of claims 2, 3, 11, 14, 15, 19, and 20 subject to being written in independent form. Based on the amendments and arguments herein, Applicants have made a sincere effort to place this case in condition for allowance.

CONCLUSION

In view of the above, Applicants believe all pending claims are in condition for allowance. Allowance of these claims is respectfully requested.

Any inquiry regarding this Amendment and Response should be directed to Philip S. Lyren at Telephone No. (281) 514-8236, Facsimile No. (281) 514-8332. In addition, all correspondence should continue to be directed to the following address:

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CERTIFICATE UNDER 37 C.F.R. 1.8

The undersigned hereby certifies that this paper or papers, as described herein, is being transmitted to the United States Patent and Trademark Office facsimile number 571-273-8300 on this 26th day of December, 2005.

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